

**IN THE UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF ARKANSAS**

**IN RE: KRISTIE WILLIAMS  
DEBTOR**

**CASE NO.: 5:20-bk-70766  
CHAPTER 7**

**RESPONSE TO MOTION FOR RELIEF FROM AUTOMATIC STAY**

COMES now the respondent/debtor, Kristie Williams, (“Debtor”) and for her Response to the Motion for Relief from Automatic Stay [DE 15] filed on April 16, 2020 by Wilson & Associates, PLLC, as counsel for M & T Bank as servicer for Lakeview Loan Servicing, LLC, states as follows:

1. Debtor admits the allegations in paragraph 1.
2. Debtor neither admits nor denies the allegations of paragraph 2; to the extent a response is required, the allegations are denied.
3. Debtor neither admits nor denies the allegations of paragraph 3; to the extent a response is required, the allegations are denied.
4. Debtor denies the allegations of paragraph 4.
5. Debtor admits she intends to surrender the collateral; Debtor denies the balance of the allegations of paragraph 5.
6. Debtor neither admits nor denies the allegations of paragraph 6; to the extent a response is required, the allegations are denied.
7. Debtor neither admits nor denies the allegations of paragraph 7; to the extent a response is required, the allegations are denied.
8. Debtor neither admits nor denies the allegations of paragraph 8; to the extent a response is required, the allegations are denied.

WHEREFORE, Debtor respectfully requests that the Motion for Relief from Automatic Stay be denied and for all other proper relief to which Debtor may be entitled.

Respectfully submitted,

/s/ Brandon M. Haubert

WH Law

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**CERTIFICATE OF SERVICE**

I, the undersigned, do hereby certify that on or about this 1<sup>st</sup> day of May 2020, a true and correct copy of the foregoing was served on the following via the electronic case filing system:

Chapter 7 Trustee

United States Trustee

Heather Martin-Herron (AB# 2011136)

Kathryn Lachowsky-Khan (AB# 2012039)

Joel W. Giddens (AB# 2018203)

WILSON & ASSOCIATES, PLLC

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Little Rock, AR 72201

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Attorneys for Creditor M & T Bank as  
servicer for Lakeview Loan Servicing, LLC

*/s/ Brandon M. Haubert*

Attorney for Debtor

Date: May 1, 2020